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Attorneys for Defendant

BRADLEY REGER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRADLEY REGER,

Defendant.

) Case No. 2:23-CR-00177-DC

)

) **EX PARTE APPLICATION TO SEAL**

) **DECLARATIONS OF COUNSEL REQUEST**

) **AND ~~[PROPOSED]~~ ORDER**

)

)

) **FILED UNDER SEAL**

)

PLEASE TAKE NOTICE that defendant Bradley Reger moves the Court for leave to file two declarations of counsel under seal. One declaration, described as Declaration 1 will be served on counsel for the government. A second declaration, described as Declaration 2, will **not** be served on counsel for the government.

The application is made upon the grounds that good cause exists to file the declarations under seal. Courts have found ex parte requests permissible. *U.S. v. Kravetz*, 709 F.3d 47, 53 (1st Cir. 2013). A defendant should be permitted to make an *ex parte* application where “identification of the

1 source of evidence potentially imperils the source or integrity of evidence; or where notice of
2 subpoena duces tecum would compromise defense counsel's trial strategy; or where a constitutional
3 interest of a defendant is implicated." *U.S. v. Sellers*, 275 F.R.D. 620, 624-625 (D. Nev. 2011).

4 This Court has the authority to file documents under seal pursuant to Federal Rule of
5 Criminal Procedure 49.1(d). Both declarations contain personal financial information of defense
6 team members. Declaration 2 is protected by the attorney-client privilege and the work product
7 privilege, including defense trial strategy. Failure to seal these declarations would impinge upon Mr.
8 Reger's constitutional rights as well as the privacy rights of defense team members.

9 There is good cause for this court to use its authority under Federal Rule of Criminal
10 Procedure 49.1(d) to file the declarations under seal.

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12 Dated: September 3, 2025

Respectfully submitted,

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14 By /s/ Kresta Nora Daly

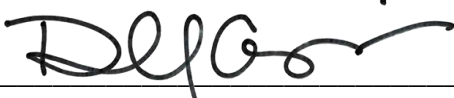
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ORDER

The court, having received, read and considered the Defendant's *Ex Parte* Application to Seal and good cause appearing therefrom, GRANTS the *Ex Parte* Application. Accordingly, the Declarations in Support of the Defendant's Motion to Continue Trial shall be SEALED until further order of the court.

IT IS SO ORDERED.

Dated: September 4, 2025


Dena Coggins
United States District Judge